

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SANDRA FACTOR

Plaintiffs,

v.

WALT DISNEY WORLD COMPANY,

Defendant.

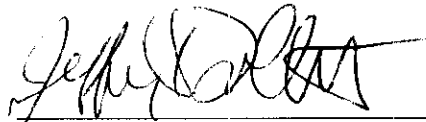
CIVIL ACTION No. 05 CV 10404 REK

**JOINT MOTION FOR CONTINUATION OF SCHEDULING CONFERENCE
AND FOR FURTHER EXTENSION OF TIME
IN WHICH DEFENDANT MAY RESPOND TO THE COMPLAINT**

The parties respectfully request that the Court continue the scheduling conference in this action, currently set for April 26, 2005, for sixty days or until such other time as is convenient for the Court. The parties also request that defendant Walt Disney World Co. be allowed until June 26, 2005 to respond to plaintiff's Complaint. In support of this motion, the parties state that they have negotiated terms of a proposed settlement agreement but that plaintiff's counsel requires additional time to coordinate and finalize communications with the Trustee of plaintiff's bankruptcy estate. In the meantime, it would not be an efficient use of the Court's or the parties' resources to proceed with a scheduling conference or to file responsive pleadings.

WALT DISNEY WORLD CO.,

By its attorneys,



Paul Bork, BBO #541815

Jeffrey S. Follett, BBO #564337

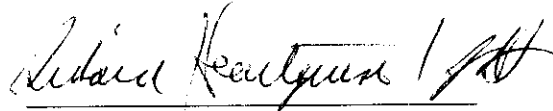
Foley Hoag LLP

155 Seaport Blvd.

Boston, Massachusetts 02210

(617) 832-1000

SANDRA FACTOR,
By her attorney,

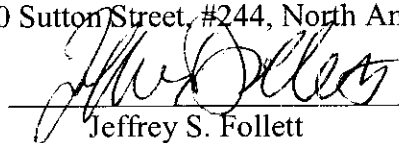


Richard Heartquist, BBO #564451
200 Sutton Street, Suite 244
North Andover, MA 01843
Tel. No.: (978) 687-6664

Dated: April 26, 2005

CERTIFICATE OF SERVICE

I hereby certify that on April 26, 2005, I caused a true copy of the foregoing document to be served upon Plaintiff by causing a copy of the same to be delivered by U.S. Mail to her counsel of record, Richard P. Heartquist, 200 Sutton Street, #244, North Andover, MA 01845.


Jeffrey S. Follett